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F-15-029

Re: Draft Central Valley Flood System Conservation Strategy comments

Dear Mr. Cepello,

Please review the attached comments on the Draft Central Valley Flood System Conservation Strategy. These comments were provided by two members of the Tehama County AB3030 Technical Advisory Committee. These comments do not necessarily represent the views of the Tehama County AB3030 Technical Advisory Committee or the Tehama County Flood Control and Water Conservation District. Please let me know if you have any questions.

Sincerely,

Ryan Teubert, Manager  
Tehama County Flood Control  
And Water Conservation District

## Central Valley Flood System Conservation Strategy

### Section 3.0 Guiding Principles and Goals

#### Table 3-1. Contribution of Conservation Strategy to the Attainment of CVFPP Goals

CVFPP—Central Valley Flood Protection Plan

What is troubling is the goal of “Promote multi-benefit projects”. This gives a heavier hand to environmentalists who sometimes have a narrow view of needs outside of those of fish or birds. This could funnel more money to projects that may not be to the best interests of the populous.

### Section 4.0 Targeted Processes, Habitats, Species, and Stressors

#### Table 4.1 Ecological Goals and Targeted Ecosystem Processes, Habitats, Species, and Stressors

This section seems to establish their goal as increasing the floodplain areas between levees. The floodplains or river meander areas appear very large. This seems to be setting groundwork for enlarging the present floodplain areas.

#### Table 4.2 (USR—Upper Sacramento River)

Should Valley Elderberry Longhorn Beetle still be listed?

Footnote 5—Inundated floodplain includes both natural and agricultural land covers. The areas, as shown, also include urban areas. I think that their floodplain accuracy should be questioned. Could their depiction influence future flood mapping requiring additional flood insurance for urban residents and farmers?

Birds seem to be doing well in general in our area. Should we question the need for additional habitat for the species listed?

Large woody material (LWM) seems to be regarded as good for the fish (See Box 4-3), but the snags in the creeks and rivers can prove hazardous to bridges and/or roadways when dislodged due to floods. This is not mentioned in this report.

Could farmlands and other private property be condemned for these projects without adequate public review?

On page 4-7, there are sweeping statements made about different crop value for wildlife. These statements don't seem to have adequate backup information in the text, and the reader is referred to several appendices that are not attached.

#### **Figure 4-1. Levee Locations in the System wide Planning Area**

If the blue area depicts the meander floodplain area, it looks very, very, large. It seems that this would be showing the area from prehistoric times. Also, the depiction of the delta area seems very vague and perhaps too large.

Should the accuracy of these maps be questioned?

#### **Section 5.2.1 Upper Sacramento River CPA (Conservation Planning Area)**

It appears (from a cursory review) that the historical floodplains, as depicted, may have been before Shasta Dam was constructed.

There are several structures in Chico that are being targeted for remediation, including the One-mile, and Sycamore dam swimming areas established in Bidwell Park on Chico Creek. These are long standing installations and provide much needed recreational activity to the community during the summer heat. The planned remediation needs careful review for the benefits to the community.

What is the definition of an urban area and a small community? (Pg. 5-14)

By notching the weirs for improved downstream flows, how will it impact water storage capacity in the upstream segments? (Pg. 5-14)

#### **Section 6.3 Agricultural Land Stewardship**

This is the most disturbing section of the report. The farm may be mandated to farm to enhance wildlife. There may be some monetary incentives for "market-based conservation program". These practices listed in this section are generally not what farmers (that I know) wish to do.

#### **Section 10 Acronyms and Other Abbreviations**

There are over 3 pages of acronyms and abbreviations which make it difficult to read the document and know which agency or item is being discussed. It seems that the full name is not identified first in the text and the abbreviation or the acronym is used without identification. One has to go to Section 10 which makes reading time consuming.

Here is my humble opinion, after a review of the **Central Valley Flood System Conservation Strategy**.

My first thought was how on earth does this document link into the **Flood Protection** measures that need to be provided in our area and where is the funding coming from to construct even the **basic** flood protections.

All of a sudden I am reviewing a document that appears to be about 95% the development of habit for the benefit of flora and fauna.

I personally love flowers and furry things but is this ideological component going to delay, complicate and threaten the very feasibility of completing the critical tasks that are needed to help mitigate the real dangers to human life and property that we are facing.

So again, to the question of why are we reviewing a document like this. As I now understand it the State of California developed and adopted the Central Valley Flood System Conservation Strategy back in 2007.

The purpose of the **Central Valley Flood System Conservation Strategy** Program is to improve integrated flood management in the Sacramento and San Joaquin Valleys. Legislation passed in 2007 directs the California Department of Water Resources (DWR) to develop **three** important documents that will guide improvement of integrated flood management. The three documents are:

- The **State Plan of Flood Control (SPFC) Descriptive Document** to inventory and describe the flood management facilities, land, programs, conditions, and mode of operations and maintenance for the State-federal flood protection system in the Central Valley.
- The **Flood Control System Status Report** that assesses the status of the facilities included in the SPFC Descriptive Document, identifies deficiencies, and makes recommendations.
- A **Central Valley Flood Protection Plan (CVFPP)** to describe a sustainable, integrated flood management plan that reflects a system-wide approach for protecting areas of the Central Valley currently receiving protection from flooding by existing facilities of the SPFC.

DWR was required to prepare the **CVFPP** by January 1, 2012. It was adopted by the Central Valley Flood Protection Board in July, 2012, and it is required to update the plan every five years (years ending in 2 and 7).

**The primary goal Central Valley Flood Protection Plan (CVFPP) is to improve flood risk management and improve O&M.**

Its secondary goals are to promote ecosystem functions. So now, as a part of the 2017 update, this document, the Central Valley Flood System Conservation Strategy is being presented. Environmental enhancements now comprise an entire element of our flood protection necessities, competing for actual flood protection funding?

The document states that the Conservation Strategy currently being developed is an important component of the 2017 update of the Central Valley Flood Protection Plan. The objectives focus on the processes, habitats, and species with the greatest potential to benefit from conservation actions integrated with flood risk management actions. The document then goes forth and presents the strategy in extensive detail.

Most of the information presented is quite honestly beyond my areas of expertise. I would be happy to stipulate that it is probably a grand document relative to its topic.

But again, why are secondary goals being developed way before the primary goals have been implemented; and where exactly is the source of funding for all of these wonderful wishes?

By Chapter 8 of the Conservation Strategy this topic is broached. Section 8.0, "Implementation," describes DWR's approach to funding, monitoring, tracking, and adaptively managing the implementation of this Conservation Strategy; and related coordination, collaboration, outreach, and engagement.

#### *8.0 Implementation*

#### *8.1 Adaptive Management*

##### *8.1.1 Adaptive Management Process*

##### *8.1.2 Monitoring*

##### *8.1.3 Informing Management through Focused Studies*

##### *8.1.4 Implementation Tracking and Data Dissemination*

##### *8.1.5 Evaluation Guidance*

##### *8.1.6 5-Year Reports*

#### *8.2 Funding Approach*

#### *8.3 Coordination and Collaboration to Integrate Conservation into Flood Management*

##### *8.3.1 Partners in Flood Management and Conservation*

##### *8.3.2 Coordination and Collaboration in CVFPP Refinement*

##### *8.3.3 Coordination and Collaboration with Ongoing Programs*

##### *8.3.4 Coordination and Collaboration with Other Regional Conservation Planning Efforts*

#### *8.4 Outreach and Engagement*

Chapter 8 contains over 20 pages of strategies and implantation topics. All fine and useful stuff, I'm sure. Section 8.2 appears to be all that addresses the crux of the matter.

## **8.2 Funding Approach**

*Ecosystem improvements in the Central Valley flood system would be funded and implemented, **where feasible**, as part of would be, in large part, a component of integrated, multi-benefit flood projects that are **expected** to be high priorities for State funding and **expected** to attract funding from other sources because of their multiple benefits, as further described below. DWR's guidelines for existing and future funding are likely to reflect the State's current multi-benefit investment priorities, **but funding priorities are ultimately going to be established as part of the funding authorization and appropriation process.***

Essentially, all of the habitat enhancement costs are being integrated into the **Central Valley Flood Protection Plan** without clearly defined any actual funding commitments. It appears that the necessary and practical is being jeopardized in order to lend support to the idealist.

*The CVFPP Financing Plan will provide more specific information about investment priorities and associated costs. It will also **identify beneficiaries**, potential funding sources, and **cost-share considerations**, as well as describe a targeted approach to funding multi-benefit projects. **The CVFPP Financing Plan is expected to be completed in 2016 and to accompany the CVFPP 2017 update.***

I am not sure how we are supposed to review, comment and lend support to a document whose most critical aspects and commitments are still to be forthcoming.

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